

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

**1121 PIER VILLAGE LLC,
PENN TREATY HOMES LLC,
2626 FRANKFORD LLC,
285 KINGSLAND LLC,
231 E 123 LLC,
193 HANCOCK LLC,**

Debtors.

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: **Chapter 11**
:
: **Lead Case No. 21-11466-ELF**
:
: **Jointly Administered**
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: **Hearing Date: September 27, 2021**
: **Hearing Time: 9:00 a.m.**
: **Hearing Place: Courtroom #1**
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NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

2626 Frankford LLC (the “Debtor”), by and through its counsel, Obermayer Rebmann Maxwell & Hippel, LLP, has filed a Motion for the entry of an Order: (i)(a) approving bid procedures for the sale of substantially all of the assets of 2626 Frankford LLC as set forth below, (b) scheduling a hearing to consider the sale and approving the form and matter of notices, (c) approving the Expense Reimbursement and Break-Up Fee and (d) granting related relief; and (ii)(a) authorizing the sale free and clear of all liens, claims, encumbrances and interests, (b) approving the Asset Purchase Agreement between the Debtor and Purchaser (or such other asset purchase agreement as may be selected at the Auction as the highest and best offer), (c) authorizing the assumption, sale and assignment of certain executory contracts, post-petition contracts and unexpired leases, and (d) granting related relief (the “Motion”).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case (if you do not have an attorney, you may wish to consult an attorney).

1. If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before **September 15, 2021** you or your attorney must do all of the following:

(a) File an answer explaining your position at the United States Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) Mail a copy to the attorney for the Movant:

Edmond M. George, Esquire
OBERMAYER REBMANN MAXWELL & HIPPEL, LLP
Centre Square West, Suite 3400
1500 Market Street
Philadelphia, PA 19102
Telephone: (215) 665-3140
Facsimile: (215) 665-3165

2. If you or your attorney do not take the steps described above and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.

3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on **September 27, 2021 at 9:00 a.m.**, in Courtroom #1, U.S. Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107-4299.

4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at 215-408-2800 to determine whether the hearing has been canceled because no one filed a response thereto.

Dated: September 1, 2021

By: /s/ Edmond M. George
Edmond M. George, Esquire
Michael D. Vagnoni, Esquire
Obermayer Rebmann Maxwell & Hippel LLP
Centre Square West
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Proposed Counsel to the Debtors